



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

SPN/MKM/KDE  
F. #2015R00757

*271 Cadman Plaza East  
Brooklyn, New York 11201*

October 20, 2020

By ECF and E-mail

The Honorable Pamela K. Chen  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. José Margulies  
Criminal Docket No. 15-252 (PKC)

Dear Judge Chen:

At the defendant José Margulies's sentencing on January 21, 2020, the government, with the consent of the defendant as well as FIFA, CONMEBOL and CONCACAF (the "Victims"), requested that the Court stay any determination of possible restitution owed by the defendant given other means by which the Victims might be compensated for their losses, which request the Court granted.<sup>1</sup> The Court has twice continued to stay any restitution determination as to the defendant, most recently on July 20, 2020, when the Court continued the stay until October 20, 2020. See Scheduling Order, ECF Dkt. Entry dated July 20, 2020.

The government writes to inform the Court that it continues to make progress in its efforts, in close consultation with the Victims, to secure an alternative means of reimbursing the Victims for their losses. Therefore, the government, with the consent of the defendant and the Victims, requests that the Court continue to stay any restitution determination as to the defendant until December 21, 2020, by which time the government will provide another update to the Court. Should there be additional developments before then, the government will so inform the Court. The government respectfully submits that

---

<sup>1</sup> The decision to grant remission or restoration lies within the sole and exclusive discretion of the Attorney General and his designees at the Money Laundering and Asset Recovery Section.

The Honorable Pamela K. Chen

October 20, 2020

Page 2

this request is consistent with the Court’s order staying the restitution payments previously ordered as to other defendants and the Second Circuit’s order staying the appeals of restitution orders as to the defendants Eduardo Li and Brayan Jiménez.

In light of the foregoing, the government respectfully requests that the Court stay any restitution determination as to the defendant until December 21, 2020.

Respectfully submitted,

SETH D. DUCHARME

Acting United States Attorney

By: /s/  
 Samuel P. Nitze  
 M. Kristin Mace  
 Keith D. Edelman  
 Assistant U.S. Attorneys  
 718-254-7000

cc: Clerk of Court (PKC) (by ECF)  
Defense Counsel (by ECF)